

## REMARKS

Claims 1-12 and 14-19 are now pending in the application. New claim 19 has been added. The Examiner is respectfully requested to reconsider and withdraw the rejections in view of the amendments and remarks contained herein.

Claims 1, 3-5, 7-11, and 14-18 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Brahmaroutu (U.S. Pub 2003/0033427). This rejection is respectfully traversed.

Claim 1 is directed to, among other things, forwarding instructions that create paths appropriate to make the network operate as a strictly non-interfering network. In a strictly non-interfering network, by definition, different source nodes do not compete and attempt to use the same network resources (e.g., switches) in order to reach their respective destinations. Specification, p. 5, Ins. 5-22. Applicant submits that Brahmaroutu fails to anticipate the above limitations.

Brahmaroutu at best appears to disclose that a multiple path assignment algorithm identifies all paths, each including one or more of the switches in the subnet, between a host system (130) and a remote IO unit (170) in a subnet. Brahmaroutu, para. [0039]. The multiple path assignment algorithm (500) then builds a forward table for each switch in the subnet, utilizing the information of shortest paths between each pair of switches. The forward tables differentiate one particular path from another path and specify an appropriate path between the host system (130) and the remote IO unit (170). In addition, separate channels at the host system (130) and the remote IO unit (170) may be used for the control flow and the data flow. In other words, Brahmaroutu is concerned with a mechanism that determines the number of possible multiple paths

between a pair of source and destination nodes. When building the forward tables, the multiple path assignment algorithm (500) does not take into consideration of the requirements of a strictly non-interfering network. Because Brahmaroutu merely addresses multiple paths and multiple channels between one pair of source and destination nodes, it cannot anticipate forwarding instructions that create paths appropriate to make the network operate as a strictly non-interfering network, i.e., a network that allows strictly non-interfering communication among more than one pair of sources and destination nodes.

In view of the foregoing, Applicant submits that claim 1 and its dependent claims 2-4, 16, and 18 define over the art cited by the Examiner. Claim 5 and its dependent claims 6-10 and 17 as well as claim 11 and its dependent claims 12 and 14-15 define over the art cited by the Examiner for one or more of the reasons set forth above regarding claim 1.

Claims 2, 6, 12 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Brahmaroutu (U.S. Pub 2003/0033427) in view of Yang (U.S. Pat. No. 5,940,389). This rejection is respectfully traversed.

Applicant submits the claims 2, 6, and 12 define over the art cited by the Examiner by virtue of their dependency from claims 1, 5, and 11 respectively.

#### **CONCLUSION**

It is believed that all of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider and withdraw all presently outstanding rejections. It is

believed that a full and complete response has been made to the outstanding Office Action and the present application is in condition for allowance. Thus, prompt and favorable consideration of this amendment is respectfully requested. If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at (248) 641-1600.

Respectfully submitted,

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By: /Joseph M. Lafata/  
Joseph M. Lafata, Reg. No. 37,166

HARNES, DICKEY & PIERCE, P.L.C.  
P.O. Box 828  
Bloomfield Hills, Michigan 48303  
(248) 641-1600

JML/PFD/evm